

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	
	§	
<b>ANSON FINANCIAL INC.,</b>	§	<b>CASE NO. 21-41517-elm-11</b>
	§	
<b>DEBTOR.</b>	§	

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**FIRST AMENDED SUBCHAPTER V PLAN OF REORGANIZATION OF  
ANSON FINANCIAL INC. DATED February 24, 2022**

**1. INTRODUCTION AND BACKGROUND INFORMATION.**

- 1.1. This First Amended Plan of Reorganization (the “Plan”) under Subchapter V of Chapter 11 of the Bankruptcy Code, 11 U.S.C. § 1101 et seq. (the “Code”) proposes to pay creditors of Anson Financial Inc. (the “Debtor” or “Anson”) from cash flow from future operations.
- 1.2. Anson filed this case on July 25, 2021 as a conventional Chapter 11 small business case. On July 27, 2021 Anson amended its voluntary petition (Docket No. 19) to proceed under Subchapter V of Chapter 11. Areya Holder Aurzada is the Subchapter V Trustee.
- 1.3. For convenience, this plan is based upon the official small business form, Form B25B. **Controlling definitions and rules of construction appear in Section 9 below.**
- 1.4. The proposed distributions under the Plan and the material terms of the Plan, including the estimated distribution to unsecured creditors is set forth in TABLE 1—Key Plan Terms, Section 2 of the accompanying Plan (“**TABLE 1**”). As provided throughout herein, the Plan generally provides for (1) the full payment and/or continued servicing of the Investor Notes (as defined below) and (2) full payment of all general unsecured claims from earnings and/or the net disposable income of the Debtor over the sixty (60) months from the Effective Date (the “Plan Term”).
- 1.5. All creditors and equity security holders should refer to Section 3 through Section 6 of this Plan for information regarding the precise treatment of their claim. ***You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)***
- 1.6. **Description and History of the Debtor’s Business.** Anson is a Texas corporation that has been in business for thirty-four (34) years primarily focused on the real estate lending field. At the core of its business, Anson originates or purchases debt instruments secured by real property (e.g. promissory notes and deeds of trust) (collectively, the “Investor Notes”) and then assigns interests in the Investor Notes to investors (the “Investors”) through collateral assignments. Anson generates its revenues by maintaining ownership of a points spread between the underlying obligation and the amount promised to Investors (the “Notes Income”).

Until December 31, 2020, Anson also received revenue as the servicer of the Investor Notes. On or about December 31, 2020, AFI Capital, Inc. dba AFI Management Group, LLC. (“AFI”) commenced its role as servicer of the Investor Notes and holder and conduit of the payments received from the underlying obligors of the Investor Notes. Anson pays a monthly fee to AFI in the amount of \$35.00 per loan. (By way of example, for the month of August, 2021, Anson paid AFI the amount of \$3,430 for the servicing of 98 loans in the Investor Notes portfolio.) Accordingly, Anson ceased its function as holder and conduit of the note payments and then the funds disbursed to the Investors. Anson’s own interest in the Investor Notes was unaltered by the transitioning of the servicing function to AFI.

The transition with respect to the serving aspects of Anson’s business was necessitated by the threat to Anson’s assets by various parties pursuing litigation against Anson (as described in Plan §1.8 below) and the enormous potential threat to the interruption of the payment stream from the underlying obligors of the Investor Notes to the Investors from the litigation.

AFI is owned 100% by Lonesome Dove Holdings, Inc. J. Michael Ferguson is the President sole Director of AFI.

- 1.7. **Insiders and Management of Anson.** J. Michael Ferguson founded Anson 35 years ago and has served as President and Sole Director of Anson since 2003, and he will continue to serve as President and Sole Director following confirmation of this Plan.

- 1.8. **Significant events before and during the Chapter 11 case.**

- 1.8.1. **Events Leading to Chapter 11 Filing.** This Chapter 11 case was commenced in terms of timing due the threat from Ian Ghrist and Ghrist Law Firm P.C. (together “Ghrist”) of Anson being placed into a receivership. Overall, the purpose of this Chapter 11 is to bring to a conclusion a long series of lawsuits primarily prosecuted by Ghrist (who was once Anson’s own attorney) and otherwise involving Frazier Management, Inc. (“Frazier”) and the collaboration between Frazier’s attorney, Caleb Moore, and Ghrist. The style and caption of the subject lawsuits is listed below (the “Lawsuits List”).

Case ## and Court	Plaintiffs / Appellants / Petitioners	Defendants / Appellees / Respondents
<b>The following pending actions involving Ian Ghrist and Ghrist Law Firm P.C., whether in the district court, Court of Appeals, or Texas Supreme Court, are referred to hereinafter as the “<u>Ghrist Lawsuits</u>.”</b>		
017-287611-16; 17 <sup>th</sup> District Court, Tarrant County, Texas; 02-18-00332-CV, 2 <sup>nd</sup> Court of Appeals; No. 21-0565; Supreme Ct. of Texas.	Ghrist Law Firm, PLLC and Ian Ghrist	J. Michael Ferguson, PC, J. Michael Ferguson, Anson Financial, Inc. and MBH Real Estate, LLC
02-18-00332-CV, 2nd Court of Appeals, Fort Worth, Texas.	J. Michael Ferguson, PC, J. Michael Ferguson, Anson Financial, Inc. and MBH Real Estate, LLC	Ghrist Law Firm, PLLC and Ian Ghrist

Case ## and Court	Plaintiffs / Appellants / Petitioners	Defendants / Appellees / Respondents
No. 21-0565; Supreme Ct. of Texas.	J. Michael Ferguson, PC and J. Michael Ferguson	Ghrist Law Firm, PLLC and Ian Ghrist
067-311209-19, 67 <sup>th</sup> District Court, Tarrant County, Texas. **alleged post judgment discovery sanctions are interlocutory orders.	MBH Real Estate, LLC, AFI Loan Servicing, LLC, Anson Financial, Inc. and J. Michael Ferguson, PC	Ghrist Law Firm, PLLC and Ian Ghrist
07-20-00027-CV, 7 <sup>th</sup> Ct of Appeals, Amarillo, Texas.  **Mandate issued on 12/21/2020	MBH Real Estate, LLC, AFI Loan Servicing, LLC, Anson Financial, Inc. and J. Michael Ferguson, PC	Ghrist Law Firm, PLLC and Ian Ghrist
<b>Other Lawsuits (Non-Ghrist Lawsuits)</b>		
236-269254-13, 236 <sup>th</sup> District Ct., Tarrant County, Texas. (Receivership in this case is what the dispute has been about)	Shawn Coker, et al	Metro Buys Homes, LLC, et. al.
342-288776-16, 342 <sup>nd</sup> District Court, Tarrant County, Texas.	B. Frazier Management, Inc. fka Frazier Asset Management, Inc. and Brian Frazier	Anson Financial, Inc.

***Due to the volume of litigation, the Debtor reserves the right amend the Lawsuit List by one or more supplements to the Plan filed prior to the Confirmation Hearing.***

On September 23, 2021, Anson removed Case No. 067-311209-19 and Case No. 342-288776-16 to this Court, which actions is now assigned Adversary No. 21-04058-elm. On or about February 16, 2022, the Court remanded Adversary No. 21-04058 back to the state court (the “Ghrist Adversary Proceeding”).

On November 1, 2021, Anson removed Case No. 342-288776-16 to this Court, which action is now assigned Adversary No. 21-04071-elm (the “Frazier Adversary Proceeding”).

- 1.8.2. Events during and information relating to this Bankruptcy Case: The entirety of the events that have occurred during this Chapter 11 case may be found on docket sheet of this case available at the Court or through the PACER website of the Court, <https://ecf.txwb.uscourts.gov/>. Any of the documents on file in this case may be

obtained by contacting the undersigned law firm or are available at the following shared folder link shown in the footnote below and selecting the folder for this case.<sup>1</sup>

The post-petition activity related to the Frazier Adversary Proceeding and the Ghrist Adversary Proceeding are referenced and described above.

The Debtor has objected to Proof of Claim No. 5 filed by Ghrist, which claim objection is pending a final resolution of the filing of this Plan.

The Debtor also has objected to Proof of Claim No. 20 filed by Frazier, which claim objection is consolidated with the Frazier Adversary Proceeding. Trial docket call in the Frazier Adversary Proceeding is scheduled to occur on April 4, 2022 as of the filing of this Plan.

After the Petition Date, two additional actions were commenced against the Debtor. as referenced and described below. As of the filing of this Plan, the Debtor believes that a settlement is within reach in the Sterling Bates action and that removal of that action will not be necessary. The Debtor will defend the Joseph Yammine adversary proceeding, and the Debtor does not believe that Yammine is entitled to any recovery and thus has objected to the underlying proofs of claim and otherwise constructed this Plan accordingly.<sup>2</sup>

Case No.	Plaintiff(s)	Defendant(s)
Cause No. 048-330187-21, 48 <sup>th</sup> District Court, Tarrant Co. Texas <sup>3</sup>	Sterling Bates	Anson Financial Inc.
Adv. No. 22-04008	Joseph Yammine dba JW Construction	Anson Financial, Inc., S & F Funding, LLC, and Chany Development, Inc.

1.8.3. *Recovery of Avoidable Transfers and other claims and causes of action of the estate.* Anson shall **RETAIN** avoidance actions or any other claims, causes of action, and/or any and all other lawsuits under Code §§544, 547, 548, 549, and/or 550, including any objections to claims and any related set offs, and any and all facts, claims, issues, rights, remedies, and/or defenses related thereto, including the claims and causes of action set forth in **Exhibit ANS305.01**. However, Anson is proposing a 100% payment plan to general unsecured creditors and thus does not believe that it will be necessary to pursue any avoidance actions in order to fully fund the Plan.<sup>4</sup>

***Otherwise, Anson may provide notice of additional claims and/or causes of action by a supplement to the Plan to be filed within seven (7) days of the Confirmation Hearing.***

<sup>1</sup> [https://drive.google.com/drive/folders/1XPWkG\\_8WZApJLcj7Z-uzsELUbw1SB2hn?usp=sharing](https://drive.google.com/drive/folders/1XPWkG_8WZApJLcj7Z-uzsELUbw1SB2hn?usp=sharing)

<sup>2</sup> The docket items from these two adversary proceedings are included in the shared folder link above.

<sup>3</sup> See also Docket No. 221, motion to lift stay filed by Sterling Bates.

<sup>4</sup> See also Plan §13.2 regarding retained causes of action.

- 1.8.4. *Objections to Claims.* Except to the extent that a claim is already allowed pursuant to a final non-appealable order, Anson reserves the right to object to all claims (including scheduled claims) through and until and even after the Effective Date. Therefore, even if your claim is allowed for voting purposes, you may not be entitled to a distribution if an objection to your claim is later upheld.

1.9. **Current And Historical Financial Conditions.**

- 1.9.1. The assets and liabilities of Anson are described in the Schedules (Docket No. 16) and Statement of Financial Affairs (Docket No. 17) filed by Anson in this case. A summary of the assets of and claims against Anson appears in **Exhibit ANS301.01**<sup>5</sup> and **Exhibit ANS302.01** attached hereto. The deadline for filing proofs of claim occurred on November 9, 2021 and February 7, 2022 for governmental entities.
- 1.9.2. A liquidation analysis appears in **Exhibit ANS303.01**.
- 1.9.3. Projections in support of the Plan appear in **Exhibit ANS304.01**.
- 1.9.4. Anson reserves the right to amend any of the schedules and other information in support of the Plan prior to the Confirmation Hearing.
- 1.9.5. The most recent operating report of the Debtor is available on PACER, the Google drive link described above, and/or by contacting the undersigned.

**NO CLAIM SHOULD BE DEEMED TO BE ALLOWED IN ANY PARTICULAR AMOUNT BASED UPON A DESCRIPTION OR REFERENCE TO ANY SUCH CLAIM OR TO ANY CLASS OF CLAIMS IN THE EXHIBITS.**

**THE DEBTOR DOES NOT WAIVE ANY FACT, CLAIM, ISSUES, RIGHT, REMEDY, AND/OR DEFENSE WITH RESPECT TO A DESCRIPTION OR REFERENCE TO ANY CLAIM IN THE EXHIBITS.**

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<sup>5</sup> The Debtor is consecutively numbering all exhibits throughout this case. The exhibits related to the plan and disclosure statement will begin with the number 300 beginning with the ballot exhibit to distinguish from previous exhibits used in this case.

2. **SUMMARY OF THE PLAN, TABLE 1 — KEY PLAN TERMS.** The key terms of this Plan are set forth in TABLE 1 below.

TABLE 1 KEY PLAN TERMS								
		TREATMENT OF CLAIMS						
Class	Creditor	Impaired	Projected Allowed Claim	Interest Rate Per Year	## Payments	Payment Per Month	Total Payments	Note
Non-classified Claims								
	WKPZ Fees (estimated)	n/a	50,000	n/a	1 to 3	n/a	50,000	
	SubV Trustee (estimated)	n/a	10,000	n/a	1	n/a	10,000	
	Priority (BPP) taxes	n/a	102	n/a	1	n/a	136	
Secured Claims								
1	Investor Notes	No	5,538,186	varies			TDB	1
2	SBA	No	154,733	3.75%	60	635	38,074	
Priority Unsecured Claims								
	None.		n/a	n/a	n/a	n/a	n/a	
General Unsecured Claims								
3	General unsecured claims	No	309,472	0	60	5,158	309,472	2
Equity Interests								
4	Equity interests - see below							
EQUITY IN REORGANIZED DEBTOR								
	Holder	% Interest		Pre-Bk Interest	Disposition			
	J. Michael Ferguson	95.37%		95.37%	Retain.			
	Chandler Ferguson Trust	1.42%		1.42%	Retain.			
	Pat Ferguson	1.19%		1.19%	Retain.			
	Jay Lesok	52.00%		52.00%	Retain.			
	Leroy York	1.50%		1.50%	Retain.			
MANAGEMENT AFTER REORGANIZATION								
	Name	Position			Comp. Per Month	Comp. Per Year		
	J. Michael Ferguson	President			0	0		
	Note: Compensation dependent upon payment of claims and-or funds available.							
EXECUTORY CONTRACTS AND/OR LEASES TO BE ASSUMED								
	Counter Party	Description of Contract			Cure Amount	Payments Per Month		
	AFI Management Group Inc.	Servicer of Investor Notes			0	3,430		
	AFI Loan Servicing, LLC	Service of mortgages			0	0		
	Investor Notes	Any and all service obligations			0	0		
	Any insurance policies	Any insurance policies			0	50		
EXECUTORY CONTRACTS AND/OR LEASES TO BE REJECTED								
	Counter Party	Description of Contract						
	Any and all other contracts							
NOTE	1 - Debtor is a conduit. Payments vary over time.							
NOTE	2 - See Section 5.3 of the Plan regarding potential variables for the class.							

### 3. CLASSIFICATION OF CLAIMS

The classification of claims and interests and the impairment of claims and interests is set forth in TABLE 1 and /or the Exhibits attached to the Plan.

### 4. TREATMENT OF ADMINISTRATIVE EXPENSE CLAIMS, U.S. TRUSTEES FEES, AND PRIORITY TAX CLAIMS

4.1. **Unclassified Claims.** Certain types of claims are automatically entitled to specific treatment under the Code. Under Code §1123(a)(1), administrative expense claims, and priority tax claims are not in classes. They are not considered impaired, and holders of such claims do not vote on the Plan. They may, however, object if, in their view, their treatment under the Plan does not comply with that required by the Code. As such, pursuant to Code §1129(a)(1), the Debtor has *not* placed such claims in any class.

4.2. **Administrative Expenses.** Administrative expenses are costs or expenses of administering the Debtor's Chapter 11 case which are allowed under Code §507(a)(2). Administrative expenses also include the value of any goods sold to the Debtor in the ordinary course of business and received within 20 days before the date of the bankruptcy petition. The Code requires that all administrative expenses be paid on the Effective Date of the Plan, unless a particular claimant agrees to a different treatment.

As of the filing of this Plan, the Debtor has received no notice of any administrative expense, other than attorneys' fees and expenses of Weycer Kaplan Pulaski & Zuber P.C. ("WKPZ") and Lee Law Firm, PLLC ("LLF") incurred for Anson and the fees of the Subchapter V Trustee.

As a condition of and prior to the Effective Date, Anson shall reserve sufficient funds to satisfy the anticipated final allowed administrative claim of each of WKPZ, LLF, and the Subchapter V Trustee, unless otherwise paid or otherwise agreed.

4.3. **Priority Tax Claims.** Priority tax claims are unsecured income, employment, and other taxes described by Code §507(a)(8). Unless the holder of such a §507(a)(8) priority tax claim agrees otherwise, it must receive the present value of such claim, in regular installments paid over a period not exceeding five (5) years from the order of relief.<sup>6</sup>

5. **TREATMENT OF CLAIMS AND INTERESTS.** The following are the classes set forth in the Plan, and the proposed treatment that they will receive under the Plan:

#### 5.1. **Class 1 — Investor Notes.**

5.1.1. **Identity of Claims in Class:** Class 1 consists of each of the holders of the various Investor Notes owned by Anson. The Investor Notes are grouped together according by holder or beneficiary of the collateral pledge and are identified in the table below.

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<sup>6</sup> Anson owes de minimis business personal property taxes of less than \$150.00 for tax year 2021, which claims are addressed in the Plan support documents as priority claims rather than create a separate class for such a small amount. No statutory tax liens are altered by the Plan.

Holder	Due as of Petition Date
Arvella Godbey	15,835
Heritage Credit, LLC	252,575
Jentex Financial, Inc.	1,682,584
S&F Funding, LLC	823,299
York Family Partnership	2,763,893
<b>TOTAL</b>	<b>5,538,186</b>

5.1.2. **Treatment:** Each claim in this class, as identified above, shall be deemed to be an allowed claim. The Investor Notes shall remain in full force and effect and payments shall continue to flow through to the Investors. None of the Investor Notes instruments shall be altered by this Plan and shall continue as written or as otherwise agreed between Anson and an Investor. Anson will continue to oversee management and servicing of the Investor Notes. Anson also will retain ownership of its interest in the Investor Notes, and the Note Income will be the primary source of funding the Plan.

5.1.3. **Voting.** Class 1 is unimpaired (and if and when applicable, according the modifications agreed to by Anson and an Investor) and deemed to accept the Plan.

5.2. **Class 2 — Small Business Administration (“SBA”).**

5.2.1. **Identity of Claims in Class:** Class 2 consists of the SBA facility referenced and described in Proof of Claim No. 1.

5.2.2. **Treatment:** Anson shall resume payment of and/or continue to pay the SBA note according to its terms.

5.2.3. **Voting.** Class 2 is unimpaired and deemed to accept the Plan.

5.3. **Class 3 — General Unsecured Claims.**

5.3.1. **Identity of Claims in Class:** Class 3 consists of the allowed claims of general unsecured creditors whose claims are filed and/or scheduled and the current status of each is listed in Exhibit ANS0302.01.

5.3.2. **Treatment:** The Debtor shall pay the allowed general unsecured claims in Class 3 in full and over a maximum period of sixty (60) months from the Effective Date of the Plan by paying (i) the net disposable income of the Debtor pro rata to the holders of claims in this Class, and (ii) if necessary, a lump sum balloon payment for the 60th payment for any remaining balance due to any Class 3 creditor at the end of the 59th month.

The payments to the Class 3 allowed general unsecured claims shall be made on the 15th day of each month commencing with the first full calendar month following the Effective Date, and shall occur on the 15th day of each succeeding month throughout the 60-month period.

The Debtor projects the payments to the Class 3 unsecured creditors according to two potential scenarios as demonstrated in **Exhibit ANS302.01** and **Exhibit**



**ANS304.01**, both of which scenarios depict different potential treatment based primarily upon the outcome of the Frazier Adversary Proceeding.

*Scenario 1* projects the impact of Proof of Claim No. 20 filed by Frazier being allowed after adjudication of the Frazier Adversary Proceeding in the maximum amount of \$28,715 (which was the redemption interest as of the Petition Date of Frazier in the Alvord 287 Partnership, but subject to setoffs, defenses, and/or reductions in the view of the Debtor).

*Scenario 2* projects the impact of Proof of Claim No. 20 filed by Frazier being allowed after adjudication of the Frazier Adversary Proceeding in the maximum amount of \$674,516 as filed.

In any event, the ultimate total amount of the allowed claims in Class 3 depends upon the final adjudication of Proof of Claim No. 20 in the Frazier Adversary Proceeding and the final adjudication of Proof of Claim No. 5 of Ghrist in the objection to such claim, both of which matters remain pending as of the filing of this Plan.

In addition, and following the final adjudication of the Frazier Adversary Proceeding (including the allowance and/or disallowance of Proof of Claim No. 20), the Debtor believes that any allowed claim of Frazier is entitled to be paid from only the assets of the Alvord 287 Partnership, and/or the assets of the Alvord 287 Partnership may be used to pay any allowed claim of Frazier (thus reducing the funds which the Debtor must contribute to Class 3).

5.3.3. **Voting.** Class 3 is unimpaired and deemed to accept the Plan.

5.4. **Class 4 — Class of Equity Interest Holders.**

As of the Petition Date, the following constitute the equity structure of Anson as set forth below.

<b>Holder</b>	<b>% Ownership</b>
J. Michael Ferguson	95.37%
Chandler Ferguson Trust	1.42%
Pat Ferguson	1.19%
Jay Lesok	.52%
Leroy York	1.50%

Each equity interest holder shall retain its interest following confirmation of the Plan.

Class 4 is unimpaired and is deemed to accept the Plan.

**6. ALLOWANCE AND DISALLOWANCE OF CLAIMS**

- 6.1. **Disputed Claim.** A disputed claim is a claim that has not been allowed or disallowed by a final non-appealable order, and as to which either: (i) a proof of claim has been filed or deemed filed,

and the Debtor or another party in interest has filed an objection; or (ii) no proof of claim has been filed, and the Debtor has scheduled such claim as disputed, contingent, or unliquidated.

- 6.2. *Without limiting future potential claim objections, the Debtor currently disputes certain claims identified in Section 5.3.1 above and/or Exhibit ANS302.01.*
- 6.3. Delay of Distribution on a Disputed Claim. No distribution will be made on account of a disputed claim unless such claim is allowed by a final non-appealable order.
- 6.4. Settlement of Disputed Claims. After the Effective Date, the Debtor will have the power and authority to settle and compromise a disputed claim without court approval and without compliance with Bankruptcy Rule 9019.

## **7. PROVISIONS FOR EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

- 7.1. The Debtor **ASSUMES** the executory contracts and/or unexpired leases referenced and described in TABLE 1 upon the date of the entry of the order confirming this Plan.
- 7.2. Specifically the Debtor assumes the contract between the Debtor and AFI for the servicing of the Investor Notes.
- 7.3. Otherwise, the Debtor will assume any executory contract for which a motion to assume is granted or pending prior to the Effective Date.
- 7.4. The Debtor will be conclusively deemed to have **REJECTED** all executory contracts and/or unexpired leases not expressly assumed above, or before the Effective Date or as otherwise specified in TABLE 1.
- 7.5. **PROOF OF CLAIM FOLLOWING REJECTION:** A proof of a claim arising from the rejection of an executory contract or unexpired lease under this section must be filed no later than **fourteen (14) days** after the date of the order confirming this Plan. Any such claim will be treated, if allowed general unsecured claim and the general unsecured creditor class will be adjusted accordingly.

## **8. MEANS OF IMPLEMENTING THE PLAN.**

- 8.1. **Source of Payments.** Payments and distributions under the Plan will be funded by the income from the normal operations of the Debtor, and consisting primarily of the Note Income.
- 8.2. **Distribution of Payments.** The reorganized Anson shall be the disbursing agent for payments under the Plan, or in the event of a confirmation under Code §1191(b), then the Subchapter V Trustee shall act as the disbursing agent, unless the Court orders otherwise.
- 8.3. **Post-confirmation Management.** The post-confirmation management of the Debtor, and the compensation for each such person is set forth in the in TABLE 1.
- 8.4. **Risk Factors.** The proposed Plan has the following risks: A sufficient number of the underlying obligors of the Investor Notes default in their obligations and/or pay off the Investor Notes early thus reducing the Note Income to Anson to a point that Anson does not possess sufficient resources to fund the payments required under the Plan.

## 9. GENERAL PROVISIONS

- 9.1. **Definitions and Rules of Construction.** The definitions and rules of construction set forth in Code §§101 and 102 shall apply when terms defined or construed in the Code. Other terms are defined throughout the Plan, and terms may be defined in the and then used in the Plan and vice versa. Any reference to the Debtor that applies to any period of time after the Effective Date shall refer to the Debtor as the Reorganized Debtor. In addition, the following terms used in the Plan are defined below.
- 9.1.1. **“Confirmation Hearing”** shall mean and refer to the hearing conducted by the Court to consider this Plan.
- 9.1.2. **“Confirmation Order”** shall mean and refer to the order confirming this Plan.
- 9.2. **Severability.** If any provision in this Plan is determined to be unenforceable, the determination will in no way limit or affect the enforceability and operative effect of any other provision of this Plan.
- 9.3. **Captions.** The headings contained in this Plan are for convenience of reference only and do not affect the meaning or interpretation of this Plan.
- 9.4. **Primacy of the Plan and Confirmation Order.** To the extent of any conflict or inconsistency between the provisions of the Plan on the one hand, and the Confirmation Order on the other hand, the provisions of the Confirmation Order shall govern and control. *Unless directed by the Court to so earlier, the Debtor will file notice of a proposed Confirmation Order seven (7) days prior to the Confirmation Hearing.*
- 9.5. **Binding Effect.** The rights and obligations of any entity named or referred to in this Plan will be binding upon, and will inure to the benefit of the successors or assigns of such entity.
- 9.6. **Controlling Effect.** Unless a rule of law or procedure is supplied by federal law (including the Code or the Federal Rules of Bankruptcy Procedure), the laws of the State of Texas govern this Plan and any agreements, documents, and instruments executed in connection with this Plan, except as otherwise provided in this Plan.
- 9.7. **Corporate Governance.** After the Effective Date of the order confirming the Plan, the management of the Debtor will consist of the following: J. Michael Ferguson, President and Director, who will receive no salary.
- 9.8. **Corporate Authority.** All actions and transactions contemplated under the Plan shall be authorized upon confirmation of the Plan without the need of further approval, notice or meetings, that might otherwise be required under applicable state law or otherwise, other than the notice provided by serving this Plan on all known creditors of Anson, all interest holders, and all current directors or managers of Anson.
- 9.9. **Sales of Property.** Any sales, transfers, and/or conveyances of some or all of the Subject Property shall be made pursuant to, at minimum, constitutes sales under Code §§ 363(f), 1122(a)(5), and/or 1125(b)(4), and each such sale, transfer, and/or conveyance shall be free and clear and any lien, claims, encumbrances, and/or any other interests, except as specified above with respect to particular Lots and/or particular conveyances.

- 9.10. **Fixing of Claims.** To the extent that the modification and/or fixing of any claim occurs under the Plan, the Plan also constitutes an objection to any filed proof of claim and/or scheduled claim under Code §502 and/or Bankruptcy Rules 3007 and 9014, and any applicable Local Rules.
- 9.11. **Settlement of Claims and Disputes.** The Plan also constitutes a motion under Bankruptcy Rule 9019 to the extent necessary to confirm the Plan.
- 9.12. **Debtor name change.** The Debtor may change its name and/or adopt one or more business aliases after the Effective Date.

## **10. EFFECT OF CONFIRMATION OF PLAN — DISCHARGE**

On the effective date of the Plan, the Debtor shall be discharged from any debt that arose before confirmation of the Plan, subject to the occurrence of the effective date, to the extent specified in Code §1141(d)(1)(A) except that the Debtor shall not be discharged of any debt (i) imposed by the Plan, (ii) of a kind specified in Code §1141(d)(6)(A) if a timely complaint was filed in accordance with Bankruptcy Rule 4007(c), or (iii) of a kind specified in Code §1141(d)(6)(B). After the effective date of the Plan your claims against the Debtor will be limited to the debts described in clauses (i) through (iii) of the preceding sentence.

## **11. EFFECTIVE DATE OF PLAN.**

The effective date of the Plan (the “*Effective Date*”) shall be the first business day following the date that is fourteen (14) days after the entry of the order of confirmation. If, however, a stay of the Confirmation Order is in effect on that date, the Effective Date will be the first business day after the date on which the stay of the Confirmation Order expires or is otherwise terminated. *The Effective Date will occur without further notice by the Debtor.*

## **12. FINAL DECREE**

Once the estate has been fully administered, as provided in Rule 3022 of the Federal Rules of Bankruptcy Procedure, the Debtor, or such other party as the Court shall designate in the Confirmation Order, shall file a motion with the Court to obtain a final decree to close the case. Alternatively, the Court may enter such a final decree on its own motion.

## **13. OTHER PLAN PROVISIONS**

- 13.1. **Scope and Retention of Jurisdiction.** The Bankruptcy Court shall retain jurisdiction to: (i) hear and determine pending applications for the assumption or rejection of contracts or leases and the allowance of Claims resulting therefrom; (ii) hear and determine any and all adversary proceedings, applications, and contested matters, including any remands of appeals, and including any Estate Actions; provided, however, that the Reorganized Debtor shall not be required to seek or obtain approval of the Bankruptcy Court under Bankruptcy Rule 9019 or otherwise as to the settlement or compromise of any Estate Actions post-Effective Date; (iii) ensure that distributions to holders of Allowed Claims are accomplished as provided herein; (iv) hear and determine any timely objections to or applications concerning Claims or the allowance, classification, priority, estimation, or payment of any Claim or Interest, and to enter Estimation Orders; (v) hear and determine all Fee Applications and Fee Claims; provided, however, that the Reorganized Debtor shall not be required to seek or obtain approval of the Bankruptcy Court under section Code §330 or otherwise as to the allowance or payment of professional fees post-Effective Date; (vi) enter and implement such orders as may be appropriate in the event the Confirmation Order is for any

reason stayed, revoked, modified, reversed, or vacated; **(vii)** hear and determine disputes arising in connection with the execution, interpretation, implementation, consummation, or enforcement of the Plan; **(viii)** enter and implement such orders as may be necessary or appropriate to execute, interpret, implement, consummate, or enforce the Plan and the transactions contemplated thereunder; **(ix)** consider any modification of the Plan pursuant to Code § 1127, to cure any defect or omission or to reconcile any inconsistency in any order of the Bankruptcy Court, including, without limitation, the Confirmation Order; **(x)** enter and implement orders or take such other actions as may be necessary or appropriate to restrain interference by any entity with the consummation or implementation of the Plan, including, without limitation, to issue, administer and enforce injunctions provided for in the Plan and the Confirmation Order; **(xi)** recover all assets of the Debtor and property of the estate, wherever located; **(xii)** hear and determine matters concerning state, local, and federal taxes in accordance with Code §§ 346, 505, and 1146; **(xiii)** hear and determine any other matter not inconsistent with the Code and title 28 of the United States Code that may arise in connection with or related to the Plan; and enter a final decree closing the Bankruptcy Case; and (xiv) to reopen the case and enforce the Plan as set forth in Section 5 above.

- 13.2. **Litigation and retained causes of action.** Anson expressly retains the claims and causes of action referenced and described in **Exhibit ANS305.01**.

*Otherwise, Anson may provide notice of additional claims and/or causes of action by a supplement to the Plan to be filed within seven (7) days of the Confirmation Hearing.*

*{continued on following page}*

**ANSON FINANCIAL INC., DEBTOR AND  
DEBTOR-IN-POSSESSION**

**By:**

/s/ J. Michael Ferguson

**By: J. Michael Ferguson, President**

**Proposed Counsel to the Debtor and  
Debtor in Possession:**

**WEYCER, KAPLAN, PULASKI & ZUBER, P.C.**

Jeff Carruth (SBT #24001846)

3030 Matlock Rd., Suite 201

Arlington, TX 76015

(713) 341-1158

(866) 666-5322 (fax)

E-mail: [jcarruth@wkpz.com](mailto:jcarruth@wkpz.com)

- and -

Christopher M. Lee

State Bar No. 24041319

**LEE LAW FIRM, PLLC**

8701 Bedford Euless Rd, Ste 510

Hurst, TX 76053

469-646-8995 Phone

469-694-1059 Fax

**EXHIBIT ANS301.01**

<b>EXHIBIT ANS301.01</b>				
<b>Assets as of Petition Date</b>				
<b>No Admission of Liability</b>				
<b>Asset Description</b>			<b>Value on Schedule A-B</b>	
Cash			31,491.00	
Cash Bond - 67th Court			4,104.10	
Cash Bond - 17th Court			243,258.68	
Notes Receivable			4,000,105.97	
Claims vs. Third Parties			208,310.33	
Tax NOL 2019			9,167.00	
Tax NOL 2020 (ESTIMATED)			573,208.80	
Interests in other entities			2,073,489.41	
<b>TOTAL</b>			<b>7,143,135.29</b>	

**EXHIBIT ANS302.01**

<b>EXHIBIT ANS302.01 - SCENARIO 1</b>									
<b>Scheduled Claims and Proofs of Claim Analysis</b>									
<b>NO ADMISSION OF LIABILITY</b>									
<b>ClaimNo</b>	<b>Class</b>	<b>Claimant</b>	<b>Secured</b>	<b>Priority</b>	<b>Unsecured</b>	<b>Total</b>	<b>Potential Allowed</b>	<b>ClassTotal</b>	<b>Notes</b>
Schedule D	1	Godbey, Arvella	15,835			15,835	15,835		
Schedule D	1	Heritage Credit, LLC	252,575			252,575	252,575		
19	1	Jentex Financial, Inc.	1,682,584			1,682,584	1,682,584		
Schedule D	1	S&F Funding, LLC	823,299			823,299	823,299		
Schedule D	1	York Family Partnership	2,763,893			2,763,893	2,763,893		
<b>Class total</b>								5,538,186	
1	2	Small Business Administration	154,733			154,733	154,733		
<b>Class total</b>								154,733	
20	3	B. Frazier Management, Inc.			674,516	674,516	28,715		Disputed / objection-adversary pending
5	3	Ghrist Law Firm PLLC			175,575	175,575	175,575		Disputed - claim objection pending
8	3	Barron, Simone			38,000	38,000	0		Disputed / objection-adversary pending
9	3	Barron, Simone			418,000	418,000	0		Disputed / objection-adversary pending
10	3	Barron, Simone			42,000	42,000	0		Disputed / objection-adversary pending
11	3	Yammine, Joseph Imad			147,000	147,000	0		Disputed / objection-adversary pending
12	3	Yammine, Joseph Imad			16,490	16,490	0		Disputed / objection-adversary pending
13	3	Yammine, Joseph Imad			129,000	129,000	0		Disputed / objection-adversary pending
14	3	Yammine, Joseph Imad			38,000	38,000	0		Disputed / objection-adversary pending
15	3	Yammine, Joseph Imad			11,000	11,000	0		Disputed / objection-adversary pending
16	3	Yammine, Joseph Imad			78,944	78,944	0		Disputed / objection-adversary pending
17	3	JPMorgan Chase			51,360	51,360	51,360		Disputed - debtor believes amount is \$0.00.
Schedule F	3	Eldridge, G. Parker			18,412	18,412	18,412		
Schedule F	3	Godbey, Carol			17,047	17,047	17,047		
Schedule F	3	York, Leroy			47,079	47,079	47,079		
<b>Class total</b>								309,472	
2	n/a	JPMorgan Chase				0			CLAIM WITHDRAWN
6	n/a	67th Judicial District Court (Ghrist)				0			Disputed - claim objection pending / duplicate
18	n/a	Wells Fargo				0			CLAIM WITHDRAWN
Schedule F	n/a	IRS				0			Notice only.
3	n/a - tax	City of Colleyville	19			19			
4	n/a - tax	Grapevine/Colleyville ISD	83			83			
7	n/a - tax	Tarrant County	34			34			



**EXHIBIT ANS302.01**

<b>EXHIBIT ANS302.01 - SCENARIO 2</b>									
<b>Scheduled Claims and Proofs of Claim Analysis</b>									
<b>NO ADMISSION OF LIABILITY</b>									
<b>ClaimNo</b>	<b>Class</b>	<b>Claimant</b>	<b>Secured</b>	<b>Priority</b>	<b>Unsecured</b>	<b>Total</b>	<b>Potential Allowed</b>	<b>ClassTotal</b>	<b>Notes</b>
Schedule D	1	Godbey, Arvella	15,835			15,835	15,835		
Schedule D	1	Heritage Credit, LLC	252,575			252,575	252,575		
19	1	Jentex Financial, Inc.	1,682,584			1,682,584	1,682,584		
Schedule D	1	S&F Funding, LLC	823,299			823,299	823,299		
Schedule D	1	York Family Partnership	2,763,893			2,763,893	2,763,893		
<b>Class total</b>								5,538,186	
1	2	Small Business Administration	154,733			154,733	154,733		
<b>Class total</b>								154,733	
	3	[None]				0			Disputed / objection-adversary pending
<b>Class total</b>									
20	4	<b>B. Frazier Management, Inc.</b>			674,516	674,516	674,516		Disputed / objection-adversary pending
5	4	Ghrist Law Firm PLLC			175,575	175,575	175,575		Disputed - claim objection pending
8	4	Barron, Simone			38,000	38,000	0		Disputed / objection-adversary pending
9	4	Barron, Simone			418,000	418,000	0		Disputed / objection-adversary pending
10	4	Barron, Simone			42,000	42,000	0		Disputed / objection-adversary pending
11	4	Yammine, Joseph Imad			147,000	147,000	0		Disputed / objection-adversary pending
12	4	Yammine, Joseph Imad			16,490	16,490	0		Disputed / objection-adversary pending
13	4	Yammine, Joseph Imad			129,000	129,000	0		Disputed / objection-adversary pending
14	4	Yammine, Joseph Imad			38,000	38,000	0		Disputed / objection-adversary pending
15	4	Yammine, Joseph Imad			11,000	11,000	0		Disputed / objection-adversary pending
16	4	Yammine, Joseph Imad			78,944	78,944	0		Disputed / objection-adversary pending
Schedule F	4	Eldridge, G. Parker			18,412	18,412	18,412		
Schedule F	4	Godbey, Carol			17,047	17,047	17,047		
Schedule F	4	York, Leroy			47,079	47,079	47,079		
<b>Class total</b>								932,628	
2	n/a	JPMorgan Chase				0			CLAIM WITHDRAWN
6	n/a	67th Judicial District Court (Ghrist)				0			Disputed - claim objection pending / duplicate
18	n/a	Wells Fargo				0			CLAIM WITHDRAWN
Schedule F	n/a	IRS				0			Notice only.
3	n/a - tax	City of Colleyville	19			19			
4	n/a - tax	Grapevine/Colleyville ISD	83			83			
7	n/a - tax	Tarrant County	34			34			

**EXHIBIT ANS303.01**

<b>EXHIBIT ANS303.01</b>		
<b>Liquidation Analysis</b>		
<b>No Admission of Liability</b>		
Cash	\$36,509.26	
AFI Management Rec	\$16,091.68	
Cash Bonds	\$0.00	
Mortgages Receivables	\$2,621,054.14	70%
62 Main St.	\$836,404.78	
AFI Technology	\$0.00	
AFM Investments, Inc.	\$137,506.58	
AFM Technology, LLC	\$67,309.34	
All American Royalties, Inc.	\$573,128.96	
Alvord 287	\$293,651.65	
MBH Real Estate, LLC	\$0.00	
Total Revenue	\$4,581,656.39	
Liabilities	\$5,701,327.35	
Net Value	(\$1,119,670.96)	

**EXHIBIT ANS304.01**

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**EXHIBIT ANS304.01**

**PROJECTIONS**

THE PROJECTED FINANCIAL INFORMATION AND OTHER FORWARD LOOKING STATEMENTS CONTAINED IN THIS DISCLOSURE STATEMENT ARE BASED ON VARIOUS ASSUMPTIONS AND ESTIMATES AND WILL NOT BE UPDATED TO REFLECT EVENTS OCCURRING AFTER THE DATE HEREOF. SUCH INFORMATION AND STATEMENTS ARE SUBJECT TO INHERENT UNCERTAINTIES AND TO A WIDE VARIETY OF SIGNIFICANT BUSINESS, ECONOMIC, AND COMPETITIVE RISKS INCLUDING, AMONG OTHERS, THOSE DESCRIBED HEREIN. CONSEQUENTLY, ACTUAL EVENTS, CIRCUMSTANCES, EFFECTS AND RESULTS MAY VARY SIGNIFICANTLY FROM THOSE INCLUDED IN OR CONTEMPLATED BY SUCH PROJECTED FINANCIAL INFORMATION AND SUCH OTHER FORWARD-LOOKING STATEMENTS.

NO CLAIM SHOULD BE DEEMED TO BE ALLOWED IN ANY PARTICULAR AMOUNT BASED UPON A DESCRIPTION OR REFERENCE TO ANY SUCH CLAIM OR TO ANY CLASS IN THE PROJECTIONS.
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**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 1**

**Anson Financial, Inc. Projections**

Month	Year	2022	4	5	6	7	8	9	10	11	12	2023	1	2	3
<b>Cash Carry Forward</b>			38,740.00	45,266.00	31,792.00	30,818.00	29,844.00	28,870.00	27,896.00	29,422.00	30,948.00	37,474.00	44,000.00	50,526.00	
<b>Income</b>															
<b>Notes Receivable Pmts</b>			55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	
<b>Gross Income + Cash Forward</b>			93,740.00	100,266.00	86,792.00	85,818.00	84,844.00	83,870.00	82,896.00	84,422.00	85,948.00	92,474.00	99,000.00	105,526.00	
<b>Operating Expenses</b>															
Management Fees			3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	
CPA Annual Tax Return			55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	
Liability Insurance			50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	
Property Taxes			10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	
<b>Plan</b>			-	-	-	-	-	-	-	-	-	-	-	-	
Admin (WKPZ + SubV Trustee)				20,000.00	7,500.00	7,500.00	7,500.00	7,500.00	5,000.00	5,000.00					
Class 1 Investor Notes			39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	
Class 2 SBA			635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	
Class 3 General unsecured			5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	
<b>Total Operating Expenses + Plan</b>			48,474.00	68,474.00	55,974.00	55,974.00	55,974.00	55,974.00	53,474.00	53,474.00	48,474.00	48,474.00	48,474.00	48,474.00	
			45,266.00	31,792.00	30,818.00	29,844.00	28,870.00	27,896.00	29,422.00	30,948.00	37,474.00	44,000.00	50,526.00	57,052.00	

**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 1**

**Anson Financial, Inc. Projections**

Month	Year	2023	4	5	6	7	8	9	10	11	2024	12	1	2	3
Cash Carry Forward		57,052.00	63,578.00	70,104.00	76,630.00	83,156.00	89,682.00	96,208.00	102,734.00	109,260.00	115,786.00	122,312.00	128,838.00		
<b>Income</b>															
Notes Receivable Pmts		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		112,052.00	118,578.00	125,104.00	131,630.00	138,156.00	144,682.00	151,208.00	157,734.00	164,260.00	170,786.00	177,312.00	183,838.00		
<b>Operating Expenses</b>															
Management Fees		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ + SubV Trustee)		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Class 1 Investor Notes		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00
Total Operating Expenses + Plan		48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00
Net Cash		63,578.00	70,104.00	76,630.00	83,156.00	89,682.00	96,208.00	102,734.00	109,260.00	115,786.00	122,312.00	128,838.00	135,364.00		

**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 1**

**Anson Financial, Inc. Projections**

Month	Year	2024	4	5	6	7	8	9	10	11	12	2025	1	2	3
Cash Carry Forward		135,364.00		141,890.00	148,416.00	154,942.00	161,468.00	167,994.00	174,520.00	181,046.00	187,572.00	194,098.00	200,624.00	207,150.00	
<b>Income</b>															
Notes Receivable Pmts		55,000.00		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		190,364.00		196,890.00	203,416.00	209,942.00	216,468.00	222,994.00	229,520.00	236,046.00	242,572.00	249,098.00	255,624.00	262,150.00	
<b>Operating Expenses</b>															
Management Fees		3,430.00		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-		-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ + SubV Trustee)		-		-	-	-	-	-	-	-	-	-	-	-	-
Class 1 Investor Notes		39,136.00		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		5,158.00		5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00
Total Operating Expenses + Plan		48,474.00		48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00
Net Cash		141,890.00		148,416.00	154,942.00	161,468.00	167,994.00	174,520.00	181,046.00	187,572.00	194,098.00	200,624.00	207,150.00	213,676.00	

**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 1**

**Anson Financial, Inc. Projections**

Month	Year	2025	4	5	6	7	8	9	10	11	2026	12	1	2	3
Cash Carry Forward		213,676.00	220,202.00	226,728.00	233,254.00	239,780.00	246,306.00	252,832.00	259,358.00	265,884.00	272,410.00	278,936.00	285,462.00		
<b>Income</b>															
Notes Receivable Pmts		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		268,676.00	275,202.00	281,728.00	288,254.00	294,780.00	301,306.00	307,832.00	314,358.00	320,884.00	327,410.00	333,936.00	340,462.00		
<b>Operating Expenses</b>															
Management Fees		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ + SubV Trustee)		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Class 1 Investor Notes		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00
Total Operating Expenses + Plan		48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00
Net Cash		220,202.00	226,728.00	233,254.00	239,780.00	246,306.00	252,832.00	259,358.00	265,884.00	272,410.00	278,936.00	285,462.00	291,988.00		

**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 1**

**Anson Financial, Inc. Projections**

Month	Year	2025	4	5	6	7	8	9	10	11	2026	12	1	2	3
Cash Carry Forward		291,988.00	298,514.00	305,040.00	311,566.00	318,092.00	324,618.00	331,144.00	337,670.00	344,196.00	350,722.00	357,248.00	363,774.00		
<b>Income</b>															
Notes Receivable Pmts		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		346,988.00	353,514.00	360,040.00	366,566.00	373,092.00	379,618.00	386,144.00	392,670.00	399,196.00	405,722.00	412,248.00	418,774.00		
<b>Operating Expenses</b>															
Management Fees		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ + SubV Trustee)		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Class 1 Investor Notes		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00	5,158.00
Total Operating Expenses + Plan		48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00	48,474.00
Net Cash		298,514.00	305,040.00	311,566.00	318,092.00	324,618.00	331,144.00	337,670.00	344,196.00	350,722.00	357,248.00	363,774.00	370,300.00		



**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 2**

**Anson Financial, Inc. Projections**

Month	Year	2022	2022	2022	2022	2022	2022	2022	2022	2022	2023	2023	2023
		4	5	6	7	8	9	10	11	12	1	2	3
<b>Cash Carry Forward</b>		<b>38,740.00</b>	40,424.00	32,108.00	26,292.00	20,476.00	15,160.00	11,844.00	8,528.00	5,212.00	1,896.00	2,580.00	3,264.00
<b>Income</b>													
<b>Notes Receivable Pmts</b>		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
<b>Gross Income + Cash Forward</b>		93,740.00	95,424.00	87,108.00	81,292.00	75,476.00	70,160.00	66,844.00	63,528.00	60,212.00	56,896.00	57,580.00	58,264.00
<b>Operating Expenses</b>													
Management Fees		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
<b>Plan</b>													
Admin (WKPZ)			10,000.00	7,500.00	7,500.00	7,000.00	5,000.00	5,000.00	5,000.00	5,000.00	1,000.00	1,000.00	1,000.00
Class 1 Investor Notes		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00
Total Operating Expenses + Plan		53,316.00	63,316.00	60,816.00	60,816.00	60,316.00	58,316.00	58,316.00	58,316.00	58,316.00	54,316.00	54,316.00	54,316.00
<b>Net Cash</b>		<b>40,424.00</b>	<b>32,108.00</b>	<b>26,292.00</b>	<b>20,476.00</b>	<b>15,160.00</b>	<b>11,844.00</b>	<b>8,528.00</b>	<b>5,212.00</b>	<b>1,896.00</b>	<b>2,580.00</b>	<b>3,264.00</b>	<b>3,948.00</b>

**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 2**

**Anson Financial, Inc. Projections**

Month	Year	2023	4	5	6	7	8	9	10	11	2024	12	1	2	3
Cash Carry Forward		3,948.00		4,632.00	5,316.00	6,000.00	6,684.00	7,368.00	8,052.00	8,736.00	9,420.00	10,104.00	10,788.00	11,472.00	12,156.00
<b>Income</b>															
Notes Receivable Pmts		55,000.00		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		58,948.00		59,632.00	60,316.00	61,000.00	61,684.00	62,368.00	63,052.00	63,736.00	64,420.00	65,104.00	65,788.00	66,472.00	67,156.00
<b>Operating Expenses</b>															
Management Fees		3,430.00		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-		-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ)		1,000.00		1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00	1,000.00
Class 1 Investor Notes		39,136.00		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		10,000.00		10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00
Total Operating Expenses + Plan		54,316.00		54,316.00	54,316.00	54,316.00	54,316.00	54,316.00	54,316.00	54,316.00	54,316.00	54,316.00	54,316.00	54,316.00	54,316.00
Net Cash		4,632.00		5,316.00	6,000.00	6,684.00	7,368.00	8,052.00	8,736.00	9,420.00	10,104.00	10,788.00	11,472.00	12,156.00	12,840.00

**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 2**

**Anson Financial, Inc. Projections**

Month	Year	2024	4	5	6	7	8	9	10	11	2025	12	1	2	3
Cash Carry Forward		19,156.00		20,840.00	22,524.00	24,208.00	25,892.00	27,576.00	29,260.00	30,944.00	32,628.00	34,312.00	35,996.00	37,680.00	
<b>Income</b>															
Notes Receivable Pmts		55,000.00		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		74,156.00		75,840.00	77,524.00	79,208.00	80,892.00	82,576.00	84,260.00	85,944.00	87,628.00	89,312.00	90,996.00	92,680.00	
<b>Operating Expenses</b>															
Management Fees		3,430.00		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-		-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ)		-		-	-	-	-	-	-	-	-	-	-	-	-
Class 1 Investor Notes		39,136.00		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		10,000.00		10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00
Total Operating Expenses + Plan		53,316.00		53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00
Net Cash		20,840.00		22,524.00	24,208.00	25,892.00	27,576.00	29,260.00	30,944.00	32,628.00	34,312.00	35,996.00	37,680.00	39,364.00	

**EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 2**

**Anson Financial, Inc. Projections**

Month	Year	2025	4	5	6	7	8	9	10	11	12	2026	1	2	3
Cash Carry Forward		39,364.00		41,048.00	42,732.00	44,416.00	46,100.00	47,784.00	49,468.00	51,152.00	52,836.00	54,520.00	56,204.00	57,888.00	
<b>Income</b>															
Notes Receivable Pmts		55,000.00		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		94,364.00		96,048.00	97,732.00	99,416.00	101,100.00	102,784.00	104,468.00	106,152.00	107,836.00	109,520.00	111,204.00	112,888.00	
<b>Operating Expenses</b>															
Management Fees		3,430.00		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-		-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ)		-		-	-	-	-	-	-	-	-	-	-	-	-
Class 1 Investor Notes		39,136.00		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		10,000.00		10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00
Total Operating Expenses + Plan		53,316.00		53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00
Net Cash		41,048.00		42,732.00	44,416.00	46,100.00	47,784.00	49,468.00	51,152.00	52,836.00	54,520.00	56,204.00	57,888.00	59,572.00	

EXHIBIT ANS304.01 -- PROJECTIONS - SCENARIO 2

Anson Financial, Inc. Projections

Month	Year	2025	4	5	6	7	8	9	10	11	2026	12	1	2	3
Cash Carry Forward		59,572.00		61,256.00	62,940.00	64,624.00	66,308.00	67,992.00	69,676.00	71,360.00	73,044.00	74,728.00	76,412.00	78,096.00	
<b>Income</b>															
Notes Receivable Pmts		55,000.00		55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00	55,000.00
Gross Income + Cash Forward		114,572.00		116,256.00	117,940.00	119,624.00	121,308.00	122,992.00	124,676.00	126,360.00	128,044.00	129,728.00	131,412.00	133,096.00	
<b>Operating Expenses</b>															
Management Fees		3,430.00		3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00	3,430.00
CPA Annual Tax Return		55.00		55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00	55.00
Liability Insurance		50.00		50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
Property Taxes		10.00		10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Plan		-		-	-	-	-	-	-	-	-	-	-	-	-
Admin (WKPZ)		-		-	-	-	-	-	-	-	-	-	-	-	-
Class 1 Investor Notes		39,136.00		39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00	39,136.00
Class 2 SBA		635.00		635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00	635.00
Class 3 General unsecured		10,000.00		10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00	10,000.00
Total Operating Expenses + Plan		53,316.00		53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00	53,316.00
Net Cash		61,256.00		62,940.00	64,624.00	66,308.00	67,992.00	69,676.00	71,360.00	73,044.00	74,728.00	76,412.00	78,096.00	79,780.00	

## **EXHIBIT ANS305.01**

### **RETAINED CAUSES OF ACTION**

Any and claim facts, claims, issues, rights, remedies, and/or defenses with respect to each of the Investor Notes and the obligations underling each of the Investors Notes.

Any and claim facts, claims, issues, rights, remedies, and/or defenses with respect to any litigation pending as of the Petition Date with any other party to relating to any of the Investor Notes and the obligations underling each of the Investors Notes, and further including any facts, claims, issues, rights, remedies, and/or defenses in any of the actions pending as of the Petition Date that are referenced and described in the schedules.

Any facts, claims, issues, rights, remedies, and/or defenses related to any claim or cause of action under Chapter 5 of the Bankruptcy Code, 11 U.S.C. § 101 et seq. and identified, referenced, and/or described in the Schedules, Statement of Financial Affairs, and/or any supplement to this Plan.

Any and all facts, claims, issues, rights, remedies, and/or defenses of the Debtor asserted or which may be asserted in any pending lawsuit, civil action, contested matter, and/or adversary proceeding referenced and described in the Plan and/or otherwise pending prior to or as of the Effective Date of the Plan.

Any facts, claims, issues, rights, remedies, and/or defenses of the Debtor referenced and/or described in Plan §1.8.3.